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McCARTER & ENGLISH, LLP
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Evan R. Chesler
Richard J. Stark
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Peter T. Barbur
Elizabeth L. Grayer
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
(212) 474-1000

Qualcomm Incorporated Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

BROADCOM CORPORATION,	:	
	:	Civil Action No. 05-3350 (MLC) (JJH)
Plaintiff,	:	
	:	
v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*

PLEASE TAKE NOTICE that as soon as counsel may be heard, Defendant Qualcomm Incorporated ("defendant") will move before this Court for an order admitting William S. Boggs, Brian A. Foster and Timothy S. Blackford of the law firm of DLA Piper, *pro hac vice* in this action.

In support of the motion, Defendant relies on the Accompanying Affidavits of William S. Boggs, Brian A. Foster and Timothy S. Blackford. Defendant respectfully submits that no brief is necessary in connection with this motion, in as much as the bases of this application are set forth in the accompanying Affidavits.

Dated: December 4, 2007

McCARTER & ENGLISH, LLP

By: s/ William J. O'Shaughnessy
William J. O'Shaughnessy (WJO-5256)
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102
(973) 622-4444

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v.	:	
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QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

**CERTIFICATION OF WILLIAM J. O'SHAUGHNESSY
IN SUPPORT OF *PRO HAC VICE* ADMISSION OF
WILLIAM S. BOGGS, ESQ., BRIAN A. FOSTER, ESQ.
AND TIMOTHY S. BLACKFORD, ESQ.**

WILLIAM J. O'SHAUGHNESSY, of full age, certifies as follows:

1. I am a member of the bar of the State of New Jersey and of McCarter & English, LLP, counsel for Defendant Qualcomm Incorporated in this action.

2. I make this Certification in support of the application of William S. Boggs, Esq., Brian A. Foster, Esq. and Timothy S. Blackford, Esq. for admission to the bar of this Court *pro hac vice*.

3. Affidavits from Mr. Boggs, Mr. Foster and Mr. Blackford in support of their respective applications for admission to the bar of this Court *pro hac vice* have also been submitted.

4. Mr. Boggs, Mr. Foster and Mr. Blackford have been advised of their obligations to comply with the Rules of Professional Conduct adopted by the New Jersey Supreme Court, and of Local Rule 101.1(c) which governs the admission of counsel *pro hac vice*.

5. Mr. Boggs, Mr. Foster and Mr. Blackford will be associated with attorneys from the firm of McCarter & English, LLP in the defense of this matter, and a member of McCarter & English, LLP will sign all pleadings, briefs, and other papers filed with the Court.

6. Our adversary, Broadcom Corporation, through its attorney, Steven Kaiser, Esq. of Cleary Gottlieb Steen & Hamilton LLP, has consented to the *pro hac vice* admission of Mr. Boggs, Mr. Foster and Mr. Blackford.

I certify under penalty of perjury that the foregoing is true and correct.

s/ William J. O'Shaughnessy
William J. O'Shaughnessy

DATED: December 4, 2007

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QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN DIEGO)

**AFFIDAVIT OF WILLIAM S. BOGGS IN SUPPORT OF
ADMISSION *PRO HAC VICE***

William S. Boggs, being duly sworn, deposes and says:

1. I am a member of the law firm of DLA Piper. My business address is 401 B
Street, Suite 1700, San Diego, California 92101. I make this Affidavit in support of the motion

of Defendant Qualcomm Incorporated ("Qualcomm") to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of California, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

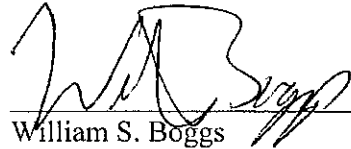
3. I am a 1972 graduate of Harvard Law School. I was admitted to practice in the State of California in 1972. I am also admitted to practice before the United States District Court for the Southern District of California (1972), the United States District Court for the Northern District of California (2004), the United States District Court for the Eastern District of California (1981), the United States Court of Appeals for the Ninth Circuit (1979), the United States Court of Appeals for the Federal Circuit (2007), and the United States Supreme Court (1980).

4. My principal practice involves civil and commercial litigation.

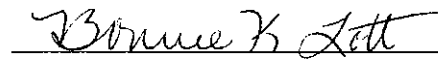
5. Our law firm is counsel for Qualcomm and we have represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

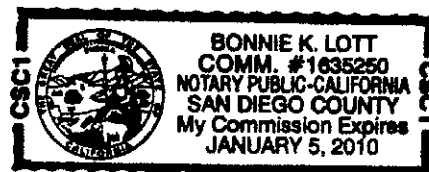
6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O'Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.


William S. Boggs

Sworn and subscribed to before me on this 3rd day of December, 2007, by William S. Boggs, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me.


Bonnie K. Lott
Notary Public for the State of California



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v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN DIEGO)

**AFFIDAVIT OF BRIAN A. FOSTER IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Brian A. Foster, being duly sworn, deposes and says:

1. I am a member of the law firm of DLA Piper. My business address is 401 B
Street, Suite 1700, San Diego, California 92101. I make this Affidavit in support of the motion

of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of California, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

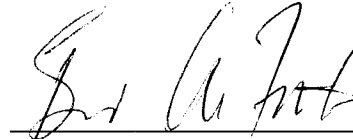
3. I am a 1983 graduate of the University of California at Berkeley School of Law. I was admitted to practice in the State of California in 1983. I am also admitted to practice before the United States District Court for the Southern District of California (1983), and the United States District Court for the Central District of California (1983).

4. My principal practice involves civil trial practice in federal and state courts, with an emphasis on representing business clientele in commercial litigation.

5. Our law firm is counsel for Qualcomm, which we have represented in litigation on numerous prior occasions. Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

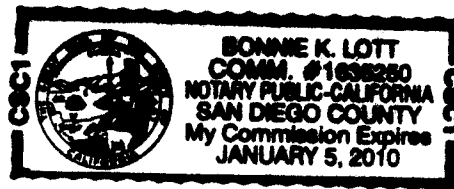
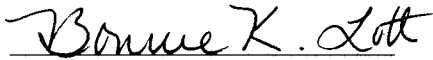
6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.



Brian A. Foster

Sworn and subscribed to before me on this 3rd day of December, 2007, by Brian A. Foster, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me.



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QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN DIEGO)

**AFFIDAVIT OF TIMOTHY S. BLACKFORD IN SUPPORT OF
ADMISSION *PRO HAC VICE***

Timothy S. Blackford, being duly sworn, deposes and says:

1. I am a member of the law firm of DLA Piper. My business address is 401 B Street, Suite 1700, San Diego, California 92101. I make this Affidavit in support of the motion

of Defendant Qualcomm Incorporated (“Qualcomm”) to admit me *pro hac vice* for purposes of representing them in this matter.

2. I am a member in good standing of the bar of the State of California, the state of which I am a resident and in which I principally practice law. There are no disciplinary proceedings presently pending against me, and no discipline has previously been imposed upon me.

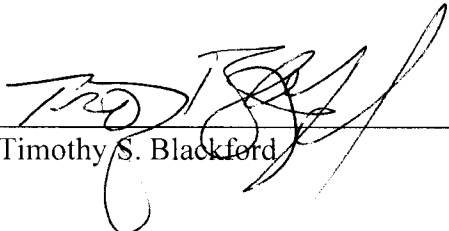
3. I am a 1997 graduate of the University of Southern California Law School. I was admitted to practice in the State of California in 1997. I am also admitted to practice before the United States District Court Southern District of California (1997); United States District Court Central District of California (1998); United States District Court Northern District of California (1999); United States District Court Eastern District of California (2000); United States Court of Appeals for the Ninth Circuit (1999); and United States Court of Appeal for the Federal Circuit (2007).

4. My principal practice involves civil and commercial litigation.

5. Our law firm is counsel for Qualcomm and has represented Qualcomm in other lawsuits, and Qualcomm has requested that we represent it in all aspects of this case, including trial, and I accordingly request that the Court admit me *pro hac vice* for these purposes.

6. I am familiar with and, if admitted, will abide by the Local Rules of this Court. I am associated in this matter with New Jersey counsel, William J. O’Shaughnessy, Esq. of the law firm of McCarter & English, LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102.

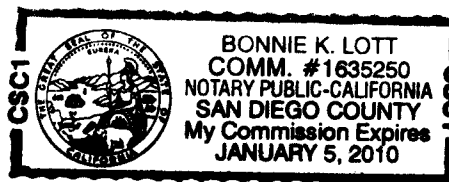
7. I will make any required payment to the New Jersey Lawyers' Fund for Client Protection.


Timothy S. Blackford

Sworn and subscribed to before me on this 3rd day of December, 2007, by Timothy S. Blackford, personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me.


Bonnie K. Lott

Notary Public for the State of California



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Plaintiff,	:	
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v.	:	
	:	
QUALCOMM INCORPORATED,	:	
	:	
Defendant.	:	

CERTIFICATION OF SERVICE

RICHARD HERNANDEZ, of full age, certifies as follows:

1. I am an attorney at law of the State of New Jersey and am associated with the firm of McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated.

2. On December 4, 2007, I caused to be delivered by ECF copies of the forgoing to:

Steven John Kaiser, Esq.
Cleary Gottlieb Steen & Hamilton LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Richard Hernandez

DATED: December 4, 2007

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ORDER GRANTING ADMISSION *PRO HAC VICE*

This matter having been opened to the Court by McCarter & English, LLP, attorneys for Defendant Qualcomm Incorporated, seeking an Order admitting William S. Boggs, Esq., Brian A. Foster, Esq. and Timothy S. Blackford, Esq., attorneys at law of the State of California *pro hac vice*, and the local counsel for Defendant (McCarter & English, LLP) having represented that Plaintiff has no objection to the entry of the within Order;

IT IS on this _____ day of _____, 2007,

ORDERED as follows:

1. William S. Boggs, Esq., Brian A. Foster, Esq. and Timothy S. Blackford, Esq. be and are hereby admitted *pro hac vice* to appear in this matter for all purposes on behalf of Defendant Qualcomm Incorporated.

2. William S. Boggs, Esq., Brian A. Foster, Esq. and Timothy S. Blackford, Esq. are required to abide by the Rules governing this Court, including all disciplinary rules, and to notify the Court immediately of any matter affecting his or her standing at the bar of any other court.

3. William S. Boggs, Esq., Brian A. Foster, Esq. and Timothy S. Blackford, Esq. are deemed to consent to the appointment of the Clerk of the Court as agent upon whom service of process may be made for all actions against him or her or their firm that may arise out of their participation in this matter.

4. William J. O'Shaughnessy, Esq. of the firm of McCarter & English, LLP, and a member of the bar of this Court, has entered an appearance in this case and shall be counsel of record in accordance with Local Civil Rule 101.1(c)(3).

5. In accordance with Local Civil Rule 101.1(c)(2), William S. Boggs, Esq., Brian A. Foster, Esq. and Timothy S. Blackford, Esq. will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a).

Honorable John J. Hughes, U.S.M.J.